



ROBERT D. GRAY
Executive Director



January 6, 2005

Mr. G. John Heyer
Presidents Committee for Purchase
from People Who Are Blind or Severely Disabled
1421 Jefferson Davis Highway
Jefferson Plaza 2, Suite 10800
Arlington, VA. 22202-3259

Re: Proposed Rulemaking-
Docket #2004-01-01

Dear Mr. Heyer:

On behalf of The Arc of Owensboro, Inc./Opportunity Center Workshop, Inc., I am writing to let you know of our opposition to the proposed rulemaking.

It is our opinion the proposed rulemaking is (1) unnecessary to the purpose/mission of the "Committee" and (2) outside the scope of the Committee's responsibilities as specified by the legislation/regulations bringing about the Committee's existence.

Our organization is a participating JWOD agency. We have provided services to persons with a disability for nearly 50 years. We serve some 100 consumers on a daily basis. Our JWOD contract is small and we are a small agency by most standards. Nevertheless, we do not agree the Committee has any responsibility, or need, to attempt to apply such governance and compensation standards as now proposed. Organizations such as ours are already "governed" by federal entities which apply existing standards/regulations to tax exempt 501(c)(3) organizations.

It is our belief, and experience that the overwhelming majority of JWOD affiliated non-profit agencies operate in an ethical and accountable manner which means we already substantially comply with requirements of the proposed regulations.

"People Helping People Since 1956"

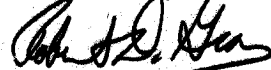


Furthermore, we do not believe the proposed rules are within the intent of the existing JWOD legislation and if adopted, would result in the opposite of that intent. That is to say they would undermine the JWOD programs current ability to increase the employment potential for persons who are blind or otherwise disabled.

Consequently, we respectfully request the Committee withdraw these rules and not be a party to "using a sledgehammer to destroy a gnat" as so many other governmental agencies seem to do - notwithstanding the intent.

Thank you for your consideration of these comments.

Sincerely,



Robert D. Gray,
Executive Director